

**Exhibit 1 to Statement of Undisputed Facts Filed in Support of Motion of American
Beryllia, Inc. For Summary Judgment**

SUZANNE GENEREUX DEPOSITION EXCERPTS

Volume: I Pages: 1-268 Exhibits: 1-12

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
Civil Action No. 04-CV-12137 JLT

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SUZANNE GENEREUX and BARRY GENEREUX, Individually
and as Parents and Natural Guardians of their minor
children, ANGELA GENEREUX AND KRISTA GENEREUX,
Plaintiffs,

v.

AMERICAN BERYLLIA CORP., BRUSH WELLMAN, INC., BRUSH
WELLMAN CERAMICS, INC., BRUSH WELLMAN CERAMIC
PRODUCTS, INC., HARDRIC LABORATORIES, INC., KYOCERA
AMERICA, INC., KYOCERA INDUSTRIAL CERAMICS CORP.,
and RAYTHEON COMPANY,
Defendants.

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VIDEOTAPED DEPOSITION OF SUZANNE GENEREUX

Wednesday, February 15, 2006, 9:16 a.m.

MEEHAN, BOYLE, BLACK & FITZGERALD

Two Center Plaza, Suite 600

Boston, Massachusetts

Reporter: Marianne R. Wharram, CSR/RPR

Suzanne Genereux

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1 Q. Occasionally they give you Prednisone?
 2 A. Yeah.
 3 Q. Who does -- who does that?
 4 A. Either Dr. Ashley or like this Dr. Abu when
 5 I was in the hospital.
 6 Q. Okay. You say occasionally. When is the
 7 last time that you took Prednisone?
 8 A. November.
 9 Q. How long did you take it?
 10 A. About somewhere in the vicinity of ten to
 11 12 days.
 12 Q. And before that time in November, what was
 13 the previous time that you had used Prednisone?
 14 A. I can't recall. I can't really be sure
 15 whether it was six months, nine months before. I'm
 16 not really sure. It was another time that I had
 17 problems breathing.
 18 Q. And at that time, how long did you take the
 19 Prednisone for?
 20 A. Usually, it goes about ten days or so.
 21 Q. Now, are you sure that on those occasions
 22 when Dr. Ashley has given you Prednisone that it's
 23 not for asthma that he's giving you that -- that
 24 drug?

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1 A. It's not for asthma.
 2 Q. It's not for asthma? All right. Would any
 3 of the medications that you are taking prevent you
 4 from testifying accurately and truthfully today?
 5 A. I don't believe so.
 6 Q. Okay. Well, let's start out by talking
 7 about your work at Raytheon. You were hired in
 8 1982; is that -- is that right?
 9 A. Yes.
 10 Q. How did you learn that there was a job
 11 opening at Raytheon?
 12 A. I actually didn't know there was a job
 13 opening for me at Raytheon. My husband had --
 14 well, my fiancé at the time, someone that we worked
 15 with at AmpereX had told us there was a job opening
 16 and we went up there. He had an interview.
 17 Q. Okay.
 18 A. And while I sat there, the human resource
 19 guy came over and asked me what I did, and I told
 20 him, and he hired me.
 21 Q. He hired you right on the spot?
 22 A. Yes.
 23 Q. You had a conversation with him that lasted
 24 for what? How long?

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1 A. Maybe ten, 15 minutes.
 2 Q. Do you remember his name?
 3 A. No. I don't recall that. That's been a
 4 long time.
 5 Q. Okay. Was this at the Waltham facility?
 6 A. Yes.
 7 Q. Okay. What did he say about the kinds of
 8 work that you would be doing at Raytheon?
 9 A. I don't recall exactly. I just know it was
 10 a job in a lab.
 11 Q. Okay. Did he say anything about working
 12 with hazardous materials?
 13 A. No.
 14 Q. Did he say anything about beryllium or
 15 beryllium oxide?
 16 A. No.
 17 Q. Did he show you the area where you would be
 18 working?
 19 A. No.
 20 Q. Did you go into the plant at all before
 21 this -- you received this job offer?
 22 A. No.
 23 Q. Before -- did you accept the job on the
 24 spot that day?

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1 A. Yes.
 2 Q. And it would be fair to say that when you
 3 accepted the job, you didn't have any idea you'd be
 4 working with beryllium or beryllium oxide?
 5 A. No.
 6 Q. Well, just so we're clear, when you took
 7 the job at Raytheon in 1982, you didn't know you'd
 8 be working with beryllium, correct?
 9 A. That's correct.
 10 Q. Before you -- before you reported to work
 11 --
 12 A. Yeah.
 13 Q. -- at Raytheon, did the company require
 14 you to have any kind of medical test or checkup?
 15 A. I believe we just had a physical.
 16 Q. Physical? Was that done by a Raytheon
 17 doctor?
 18 A. Uh, I believe so, but I'm not really sure.
 19 I believe it was a Raytheon doctor.
 20 Q. And was it at the Waltham plant?
 21 A. I don't recall exactly. It could well have
 22 been. I mean, we had -- we had a physician on
 23 there. I don't recall. His name was a mile long.
 24 Q. You don't recall his name?

5 (Pages 14 to 17)

<p style="text-align: right;">Page 18</p> <p>1 A. P something or other.</p> <p>2 Q. Okay. Did Raytheon require you to have a</p> <p>3 chest x-ray --</p> <p>4 A. No.</p> <p>5 Q. -- before you started working?</p> <p>6 A. Not that I -- no. I don't remember</p> <p>7 anything that -- you know, it was just a simple</p> <p>8 physical; asked your background and I told him.</p> <p>9 Q. Did they give you any kind of a lung test?</p> <p>10 A. No.</p> <p>11 Q. Now, is it -- is it correct that your first</p> <p>12 job at the Waltham plant was large power tube parts</p> <p>13 assembler? Does that sound right?</p> <p>14 A. It was in the same lab, so just -- I really</p> <p>15 don't know what the na-- the title exactly was. It</p> <p>16 was this one BWO lab that we worked in.</p> <p>17 Q. What was the name of the lab?</p> <p>18 A. A BWO lab, backward wave oscillator.</p> <p>19 Q. B-W-O?</p> <p>20 A. Yes.</p> <p>21 Q. What is a backward wave oscillator?</p> <p>22 A. I have no clue.</p> <p>23 Q. Is that what the lab was making?</p> <p>24 A. I believe so. That's the name of the lab</p>	<p style="text-align: right;">Page 20</p> <p>1 A. Ever?</p> <p>2 Q. During your years at Raytheon, '82 to '90?</p> <p>3 A. No.</p> <p>4 Q. You never got a security clearance?</p> <p>5 A. Hmm-mm.</p> <p>6 Q. Did you ever apply for a security</p> <p>7 clearance?</p> <p>8 A. No.</p> <p>9 Q. Did anyone ever tell you that you needed a</p> <p>10 security clearance?</p> <p>11 A. No.</p> <p>12 Q. Who was your supervisor in that first job</p> <p>13 in the BWO lab?</p> <p>14 A. Can't remember his name. It starts getting</p> <p>15 -- I remember later, but -- I remember seeing the</p> <p>16 guy, very tall and lanky, but I don't recall his</p> <p>17 first name.</p> <p>18 Q. How long did you work in that lab? Was</p> <p>19 that the whole eight years?</p> <p>20 A. Except for the last year or so. Then I was</p> <p>21 in quality assurance, or quality control.</p> <p>22 Q. What was your job in the lab?</p> <p>23 A. To -- to assemble subassemblies.</p> <p>24 Q. Okay. Is that all?</p>
<p style="text-align: right;">Page 19</p> <p>1 that they tell us to go to, so.</p> <p>2 Q. Was it your understanding that the things</p> <p>3 being made in this lab were being made for the U.S.</p> <p>4 government?</p> <p>5 A. That's what I was told by people who worked</p> <p>6 there, by coworkers, that, you know, this was just</p> <p>7 stuff that they were making.</p> <p>8 Q. They were making for the government,</p> <p>9 correct?</p> <p>10 A. To the best of my knowledge, that's what</p> <p>11 they had -- you know.</p> <p>12 Q. This was military equipment that they were</p> <p>13 making?</p> <p>14 A. Nobody really specified it. They just</p> <p>15 pretty much said, you know, that some of the things</p> <p>16 that we were doing in that lab had to do with, you</p> <p>17 know, their different systems, whatever they were</p> <p>18 making at the time.</p> <p>19 Q. Do you know if these were radar systems?</p> <p>20 A. I haven't got a clue.</p> <p>21 Q. Did you have to get any kind of a security</p> <p>22 clearance to work there?</p> <p>23 A. No.</p> <p>24 Q. Did you ever get a security clearance?</p>	<p style="text-align: right;">Page 21</p> <p>1 A. That entailed, you know, assembling them</p> <p>2 per print, by specs.</p> <p>3 Q. First of all, what do you mean by a</p> <p>4 subassembly? What is that?</p> <p>5 A. Well, I guess the easiest way to put it is</p> <p>6 I don't know where the end product was going, so we</p> <p>7 just knew -- I made it and then part A gets sent</p> <p>8 out to place B, and it goes on from there.</p> <p>9 Q. Well, can you describe for us the various</p> <p>10 steps that you performed in the assembly process?</p> <p>11 A. On different -- there was different parts.</p> <p>12 Everyone had different names for the items you were</p> <p>13 making. An example would be an ARCO window, which</p> <p>14 was what I did most of the time.</p> <p>15 Q. What kind of a window?</p> <p>16 A. They spelled it A-R-C-O.</p> <p>17 Q. Okay.</p> <p>18 A. And basically, the parts either came</p> <p>19 kitted, or you had to go and get the parts. You</p> <p>20 were given a total amount to make. You put the</p> <p>21 pieces together. You make -- you make sure the</p> <p>22 identification of each part is per print, then you</p> <p>23 will file to fit, and then you will put it -- mount</p> <p>24 it into a fixture. That fixture goes to brazing.</p>

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1 When you get the part in 24 hours, it is now a
 2 subassembly. You remeasure it to make sure that
 3 assembly is to size, to print.
 4 Q. Was that the last step, or was there also
 5 some cleaning?
 6 A. Well, in the process sheet, it would tell
 7 you different steps that you had to do. If your
 8 process sheet called for sandblasting of the virgin
 9 window, then you would sandblast the window prior
 10 to the brazing, then you would -- we were required
 11 to re-- resandblast after it came up and it had
 12 been leak checked and it was found to be acceptable
 13 to go to the next step.
 14 Q. So there could be several sandblasting
 15 steps in the assembly process?
 16 A. Oh, definitely.
 17 Q. You said most of the time that you worked
 18 in the lab was -- was spent on these ARCO windows;
 19 is that right?
 20 A. Right.
 21 Q. What percentage of the time, roughly, would
 22 you say?
 23 A. A good 80 percent of my day.
 24 Q. For the whole seven-year period or so?

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1 A. That -- there was other assemblies, so you
 2 had like small ones. You might -- there was a tall
 3 man. I don't know. It had a number to it, had a
 4 rectangular about an inch thick beryllium ceramic
 5 that's used to make it. I don't know. We only did
 6 a few of those.
 7 Q. Okay. All right. Was -- well, were there
 8 other people who were doing the same assembly as
 9 you at the same time?
 10 A. No. There was someone who trained me when
 11 I first started, and then he retired.
 12 Q. Who was that?
 13 A. Bob Blood.
 14 Q. Flood, is it?
 15 A. Blood.
 16 Q. Blood? Okay. But you were the only person
 17 for that whole period of time who was assembling
 18 the ARCO window?
 19 A. Yes.
 20 Q. Were there other people who worked in the
 21 same lab?
 22 A. There was other people in the same lab.
 23 Q. How many people worked in that lab?
 24 A. I don't know offhand. I'm going to

Page 24

1 estimate somewhere about 20 to 30.
 2 Q. Okay. Were there other people who were
 3 working with beryllium oxide parts in the lab?
 4 A. Yeah, different stages. The tall -- you
 5 know, sometimes my first assembly would go on to
 6 somebody else.
 7 Q. Okay. Do you remember the names of some of
 8 the other people who worked with you in that lab?
 9 A. Not the full name; maybe first name. You
 10 know, I mean, most of the time you're working, you
 11 don't know everyone's first and last name.
 12 Q. Okay. Have you kept up a friendship with
 13 any of the people that you've worked with?
 14 A. Not really.
 15 Q. Okay. When did Bob Blood give you the
 16 training that you mentioned?
 17 A. 1982.
 18 Q. Okay. The first day you showed up for
 19 work?
 20 A. Mm-hmm.
 21 Q. Tell us what you remember about the
 22 training.
 23 A. He explained what a bastard file was and
 24 explained to me how to use it to remove just enough

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1 metal to make them meet, you know. He explained to
 2 me what Eutectic was, which is the brazing
 3 compound; you know, explained simply where to get
 4 the parts and where to get the fixtures and how to
 5 put it together.
 6 Q. Did he say anything to you about any health
 7 hazards from the material you were working with?
 8 A. No.
 9 Q. No?
 10 A. No.
 11 Q. Did he say anything about beryllium or
 12 beryllium oxide?
 13 A. No, just that the print showed a beryllium
 14 ceramic, so he just showed me where to go to fetch
 15 my pieces.
 16 Q. But he didn't tell you that there was any
 17 danger associated with beryllium oxide?
 18 A. No.
 19 Q. Did you know, when you started working at
 20 Raytheon with these parts, that there is a health
 21 risk associated with beryllium?
 22 A. No.
 23 Q. No? Did Mr. Blood tell you about any
 24 equipment that you should use to protect yourself

<p style="text-align: right;">Page 26</p> <p>1 from breathing in beryllium oxide dust?</p> <p>2 A. No.</p> <p>3 Q. Did he give you a respirator?</p> <p>4 A. No.</p> <p>5 Q. Did he say anything about using a</p> <p>6 respirator?</p> <p>7 A. No. When he was sandblasting, he didn't</p> <p>8 use one. He just showed me where it was and how to</p> <p>9 use it.</p> <p>10 Q. Okay. Did you do the brazing yourself, or</p> <p>11 was that --</p> <p>12 (Witness gesturing.)</p> <p>13 Q. No? That was done in a separate --</p> <p>14 A. It's a very hot oven. You just -- you</p> <p>15 transported -- you know, you walk the units down.</p> <p>16 You transport it to the oven room and they took it</p> <p>17 from there. You went back and fetched your parts</p> <p>18 in the morning.</p> <p>19 Q. You mentioned using a bastard file. Can</p> <p>20 you describe what you did with the file?</p> <p>21 A. A little tiny file.</p> <p>22 Q. A little tiny file? And what were you</p> <p>23 filing?</p> <p>24 A. The copper -- the beryllium copper</p>	<p style="text-align: right;">Page 28</p> <p>1 A. You went to your lab and the supervisor</p> <p>2 said sit here and here's Bob and welcome.</p> <p>3 Q. Bob will show you what to do?</p> <p>4 A. That's it.</p> <p>5 Q. So before you started working, Raytheon</p> <p>6 didn't give you any information of any kind about</p> <p>7 any health risks that you might -- might be facing?</p> <p>8 A. No.</p> <p>9 Q. And Raytheon didn't give you any training</p> <p>10 of any kind about how to work safely with beryllium</p> <p>11 or beryllium oxide?</p> <p>12 MR. HONIK: Object to the form of the</p> <p>13 question. You can answer, Suzy. Do you remember</p> <p>14 his question?</p> <p>15 Q. (BY MR. UBERSAX) I'll ask it again.</p> <p>16 A. Go ahead.</p> <p>17 MR. HONIK: Just by way of instruction</p> <p>18 to you, from time to time, I may place an objection</p> <p>19 on the record. You needn't concern yourself with</p> <p>20 my objection, unless I instruct you otherwise, but</p> <p>21 I'm protecting the record in doing so.</p> <p>22 A. Sorry. Go ahead.</p> <p>23 Q. (BY MR. UBERSAX) I'll ask again. Before</p> <p>24 you started working in the lab with beryllium oxide</p>
<p style="text-align: right;">Page 27</p> <p>1 sleeveings that you had to -- they had to meet just</p> <p>2 right into the stainless steel pieces.</p> <p>3 Q. Were you also filing any beryllium oxide</p> <p>4 parts, or was it only the beryllium copper?</p> <p>5 A. I don't -- I don't recall any filing. We</p> <p>6 had a lot of sandblasting to do with the ceramic,</p> <p>7 because if you file a ceramic, you can damage it.</p> <p>8 Q. Okay. When you used the bastard file on</p> <p>9 beryllium copper, did that ever create any dust</p> <p>10 that you could see?</p> <p>11 A. Not that you can really see. I mean, it is</p> <p>12 a very fine file and you're doing very -- very</p> <p>13 close, because the tolerances are close.</p> <p>14 Q. When you showed up for work in 1982, did</p> <p>15 you get any kind of orientation other than what</p> <p>16 Mr. Blood gave you?</p> <p>17 A. What do you mean?</p> <p>18 Q. Did Raytheon give you any kind of</p> <p>19 introduction to the job, tell you what you would be</p> <p>20 doing and so on and so forth?</p> <p>21 A. No.</p> <p>22 Q. No? You came to work the first day and</p> <p>23 went straight to meet with Mr. Blood? Is that how</p> <p>24 it worked?</p>	<p style="text-align: right;">Page 29</p> <p>1 and beryllium copper, did Raytheon give you any</p> <p>2 training about how to protect yourself against any</p> <p>3 health risk from beryllium?</p> <p>4 A. No.</p> <p>5 Q. Before you started working with beryllium</p> <p>6 oxide and beryllium copper at Raytheon, did the</p> <p>7 company give you any information at all about any</p> <p>8 health risk from beryllium?</p> <p>9 A. No.</p> <p>10 Q. During your whole time at Raytheon, from</p> <p>11 1982 to 1990, did the company ever tell you</p> <p>12 anything about chronic beryllium disease?</p> <p>13 A. No.</p> <p>14 Q. Did the company ever tell you during those</p> <p>15 eight years that exposure to beryllium could be</p> <p>16 harmful to a person's health?</p> <p>17 A. No.</p> <p>18 Q. Did Raytheon ever tell you that beryllium</p> <p>19 can cause lung disease?</p> <p>20 A. No.</p> <p>21 Q. Did the company ever show you a videotape</p> <p>22 about the risks of beryllium?</p> <p>23 A. No.</p> <p>24 Q. Did you ever go to a presentation by</p>

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1 anybody from Brush Wellman about beryllium?
 2 A. No.
 3 Q. Did you -- did you attend a presentation by
 4 anybody from any company --
 5 A. No.
 6 Q. -- about beryllium?
 7 A. No.
 8 Q. No?
 9 A. No.
 10 Q. Did you ever see -- well, let me back up.
 11 Do you know what a material safety data sheet is?
 12 A. I have heard of them, but we weren't privy
 13 to anything. You know, we didn't have anything.
 14 Q. Where have you heard of them?
 15 A. Just after the fact. I mean --
 16 Q. Okay. You never heard of one when you were
 17 at Raytheon?
 18 A. No.
 19 Q. No one ever mentioned material safety data
 20 sheets to you?
 21 A. No.
 22 Q. No one ever showed you a material safety
 23 data sheet for any material containing beryllium?
 24 A. No.

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1 Q. No?
 2 A. No.
 3 Q. No one ever told you that if you wanted to
 4 see a material safety data sheet for beryllium
 5 oxide or beryllium copper, you could go to a
 6 certain place and they were there?
 7 A. No.
 8 Q. Did -- was there a human resources
 9 department at Raytheon? Do you know?
 10 A. I believe that's the people who hire you.
 11 Q. Okay. And was there -- in that department,
 12 was there a safety office? Do you know?
 13 A. I don't recall any.
 14 Q. Okay. Did Raytheon ever give you any kind
 15 of a document that talked about any health risk of
 16 beryllium?
 17 A. No.
 18 Q. Did anyone at Raytheon tell you that the
 19 Federal Occupational Safety and Health
 20 Administration has a regulation that limits the
 21 amount of beryllium that can be in the air at a
 22 workplace?
 23 A. No.
 24 Q. Did you ever hear of the -- the figure two

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1 micrograms per cubic meter --
 2 A. No.
 3 Q. -- of beryllium? Excuse me; per cubic
 4 meter of air. You never heard anyone talk about a
 5 federal limit or a federal standard? No?
 6 A. No.
 7 Q. And no one ever told you that -- that if
 8 exposures were kept below a certain limit, that --
 9 that beryllium -- exposure to beryllium were safe?
 10 A. No.
 11 Q. Do you know whether Raytheon took any
 12 measurements of beryllium in the air at the Waltham
 13 plant?
 14 A. Not to my knowledge.
 15 Q. Did you ever see any kind of device in your
 16 work area that was -- that was sampling the air?
 17 A. At -- yes, just when I went -- at the end,
 18 when I went into QC. I don't -- I wasn't working
 19 in the lab any more, okay, because I was at a
 20 different section. There was somebody -- because
 21 they changed the lab to what they called a clean
 22 room, so they had people wearing bonnets, and I
 23 know that they would wheel in a machine, but I
 24 don't know what -- exactly what they were

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1 measuring.
 2 Q. Okay. That was in the QC department?
 3 A. No. That -- the lab that I worked in
 4 changed.
 5 Q. Okay.
 6 A. When I left and I went to QC, the lab was
 7 switched to a clean room lab.
 8 Q. All right.
 9 A. But I didn't work there. I was no longer
 10 in that room.
 11 Q. Okay. When did that switch take place?
 12 A. You know, it was after I was in QC. I
 13 would say approximately 1989; late 1988, maybe.
 14 Q. Were they still doing the same kinds of
 15 work in that lab after you left?
 16 A. I had left the room. To the best of my
 17 knowledge, there were people still doing it, but I
 18 don't really recall, because I wasn't in there.
 19 Q. What kinds of things did Raytheon do to
 20 make it a clean room?
 21 A. I have no clue. I wasn't working in the
 22 room at the time.
 23 Q. Well, what did you observe that was
 24 different about the room?

<p style="text-align: right;">Page 38</p> <p>1 Q. Okay. When did you first learn that 2 beryllium oxide or beryllium copper can be 3 dangerous to human health? 4 A. I first -- well, I didn't know it was 5 dangerous to human health. I was just directed 6 through the Department of Labor to go to National 7 Jewish to have this test. 8 Q. When you left Raytheon in 1990, did you 9 know at that time that beryllium presents any kind 10 of a risk to human health? 11 A. No. 12 Q. When I say beryllium, that includes 13 beryllium oxide, beryllium copper and all forms of 14 beryllium, right? You had no idea that those 15 things -- 16 A. Not a clue. 17 Q. -- had presented any risk to you at all? 18 A. No. 19 Q. All right. I want to go back to your 20 statement about the Department of Labor. 21 A. Mm-hmm. 22 Q. What happened with the Department of Labor? 23 A. I was told to call them through Jack Reed's 24 department, Senator Jack Reed.</p>	<p style="text-align: right;">Page 40</p> <p>1 the letter, to call his office, and he -- they 2 asked if I had ever been tested for CBD, which I 3 had never heard of, and they told me I should 4 contact the Department of Labor in Washington, and 5 he gave me the number. 6 Q. Okay. When you say they asked you, who was 7 -- 8 A. Senator Reed's office. 9 Q. Of course, you don't remember who? 10 A. No. 11 Q. So how did the whole question of beryllium 12 come up in this conversation? 13 A. I don't really recall. It had to do with 14 my -- my letter. I wrote to them and I told them 15 where I had worked and that I just -- I thought 16 that it was wrong that Raytheon had taken my long 17 term disability, and I wanted to find out how to 18 get it back. 19 Q. Did your letter say anything about 20 beryllium? 21 A. I don't believe so. 22 Q. Okay. Why had you been put on long term 23 disability? What had disabled you? 24 A. I had a high risk pregnancy at first, and</p>
<p style="text-align: right;">Page 39</p> <p>1 Q. Senator Jack Reed's office called you? 2 A. I had written him a letter, because I 3 wanted to find out what I could do to get my long 4 term disability back. 5 Q. Okay. Have you kept a copy of that letter? 6 Do you know? 7 A. I don't remember if I did or not. 8 Q. What did the letter say? 9 A. Just that I was upset, I had had a stroke, 10 and I felt that I wanted to understand why Raytheon 11 had taken my long-term disability. 12 Q. You had a stroke in 1996; is that right? 13 A. Mm-hmm. 14 Q. Was that during your visit to Disney World? 15 A. Yes. 16 Q. What -- did you see a heart doctor in 17 connection with that? 18 A. I really don't recall like the first six 19 months, you know, immediately afterwards. 20 Q. Okay. Well, we'll get back to that. Let's 21 go back to the letter to -- to Senator Reed. Did 22 you get a letter back from his office, or was it a 23 phone call, or what happened? 24 A. He had sent -- I believe he said it with</p>	<p style="text-align: right;">Page 41</p> <p>1 it was followed by other health issues. 2 Q. What were those health issues? 3 A. I had carpal tunnel. 4 Q. And in fact, you had surgery on both hands 5 for that? 6 A. Yes. 7 Q. And then after -- and that, of course, 8 prevented you from working? 9 A. Mm-hmm. 10 Q. Yes? 11 A. Yes. 12 Q. And then after the carpal tunnel surgeries, 13 you were then diagnosed with Parkinsonism, correct? 14 A. Right. My right hand had never come back 15 to the full capacity, even with physical therapy. 16 Q. Okay. And did that -- that also kept you 17 from working, the Parkinsonism? 18 (Witness gesturing.) 19 Q. So you felt that your long term -- that you 20 should be put on and kept on long term disability 21 because of the Parkinson's disease? 22 A. Mm-hmm. 23 Q. Yes? 24 A. Yes.</p>

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1 Q. Did the representative of Senator Reed ask
2 you questions about -- about your workplace?
3 A. I don't recall the entire conversation.
4 Q. I'm just trying to get at how the subject
5 of beryllium came up at all.
6 A. It is -- it is such a long time ago. I
7 just recall him -- I just recall the girl saying is
8 that the Waltham plant, and I said yes, but to say
9 exactly, you know, I just remember getting the
10 number. I would have never thought of the labor
11 department in Washington. She gave me the number,
12 and from there, they told me about National Jewish
13 and that I should call them, which I did, and
14 that's it.
15 Q. Had you ever heard of chronic beryllium
16 disease before this conversation with Senator
17 Reed's office?
18 A. No.
19 Q. Did you ask them, you know, what is chronic
20 beryllium disease?
21 A. Yeah.
22 Q. And did she say anything about that?
23 A. No. She just told me that I needed to call
24 the labor department.

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1 Q. After that call, did you go out and try to
2 get some information about chronic beryllium
3 disease?
4 A. I tried to understand what people were
5 trying to send me for. They sent me for a blood
6 test.
7 Q. Okay.
8 A. And that was the first thing, but.
9 Q. Did you do any research or reading about
10 chronic beryllium disease, which you'd never heard
11 of before?
12 A. I don't recall doing it at that point,
13 because it was just a blood test, and my doctor
14 arranged it. You know, I mean, we just had to get
15 the --
16 Q. Was that Dr. Ashley?
17 A. Yes.
18 Q. Did you -- you called him to arrange the
19 blood test after this phone call with Senator Reed?
20 A. No, National Jewish.
21 Q. You called --
22 A. Yeah, National Jewish people sent a
23 container --
24 Q. Okay.

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1 A. -- and a procedure, and then that had to
2 arrive.
3 Q. Right.
4 A. And then I had to go to Dr. Ashley's, and
5 they had to arrange between -- something about
6 Colorado with the timing and whatnot, and then
7 after the blood was taken, I had to take it to
8 FedEx.
9 Q. Did the person from Senator Reed's office
10 tell you that chronic beryllium disease is a lung
11 disease?
12 A. No.
13 Q. When did you first learn that chronic
14 beryllium disease is a lung disease?
15 A. When I was -- af-- after the second test
16 came back positive and National Jewish people --
17 Heather Davis had called and told me the next step
18 would be a lung biopsy.
19 Q. Okay. Didn't you ask -- when you went in
20 for the -- for the -- to Dr. -- you went to
21 Dr. Ashley's office to have a blood sample taken?
22 A. Right.
23 Q. Is that right? And did you talk with
24 Dr. Ashley when you went in for that visit?

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1 A. No.
2 Q. No?
3 A. Went right into the little lab that's in
4 his office. They had already gotten all the
5 instructions, you know, and all I knew was the girl
6 told me, you know, well, they must do this because
7 you were exposed to beryllium, you know, and we
8 just went ahead with that and didn't know what --
9 just knew that okay, I'm having this test because I
10 was exposed. Okay, I know I was exposed, but to
11 say that I knew any outcome, no.
12 Q. Did Senator Reed's office tell you anything
13 about the symptoms of chronic beryllium disease or
14 what it can do to a person?
15 A. No.
16 Q. After you had this phone call with -- with
17 Senator Reed's office --
18 A. Mm-hmm.
19 Q. -- were you concerned that exposure to
20 beryllium at the Raytheon plant may have caused
21 some of your health problems?
22 A. I was shocked that -- that they had said
23 that there was something that could have happened
24 from working there, but you know, other than that,

<p style="text-align: right;">Page 46</p> <p>1 I just called the labor department and then 2 National Jewish. 3 Q. Okay. So you decided to follow up and 4 investigate whether exposure to beryllium had had 5 some effect on you, right? 6 A. Yeah. 7 Q. How much time was there between the phone 8 call with Senator Reed's office and the -- the 9 blood draw at Dr. Ashley's office? 10 A. Oh, I'm not really sure. I'm going to 11 estimate. Somewhere six to nine months, maybe. 12 Q. Okay. Why did it take so long? 13 A. I have no idea. By the time they got the 14 sample box down to Dr. Ashley's office and they 15 arranged that, you know -- 16 Q. Did -- how long after the call with Senator 17 Reed's office did you call the Department of Labor? 18 A. Oh, probably maybe -- I tried a few times. 19 The line is like always -- nobody answers. You 20 know, it's a -- you leave a message, and I think 21 you had to leave your name or something, and then 22 it took a while before they actually called me 23 back. And then they basically took down some 24 information, and from there, they just directed you</p>	<p style="text-align: right;">Page 48</p> <p>1 in this lab? 2 A. I never saw any. I don't recall if they 3 were. 4 Q. Okay. Did you ever go through a process to 5 get some kind of a medical clearance to let you use 6 a respirator? 7 A. No. 8 Q. How about gloves? Did Raytheon ever 9 require you to wear gloves when you were handling 10 beryllium oxide or beryllium copper parts? 11 A. No. The only gloves were rubber gloves 12 when you sandblasted. 13 Q. Did you ever see any signs or posters at 14 Raytheon about beryllium? 15 A. No. 16 Q. Did you ever see any warning labels on 17 packages of beryllium-containing material that came 18 in to the Raytheon plant? 19 (Witness gesturing.) 20 A. Hmm, no. 21 Q. Did you ever see any warning labels that 22 Raytheon put on to finished products that it sent 23 out to its customers? 24 A. No, because I never saw real finished</p>
<p style="text-align: right;">Page 47</p> <p>1 to the next step, you know, and that was it. I 2 mean -- 3 Q. Was that within a few weeks of your -- 4 A. I believe it was, but I'm not really sure. 5 Q. -- your phone call with Senator Reed? And 6 then how long did it take to make contact with 7 National Jewish after that? 8 A. It took a little bit of time to get 9 through, because again, you had to leave your name 10 and number, and you know, Heather got back to you. 11 And when she did, you know, I don't really recall 12 exactly. I'm going to say a couple of weeks tops, 13 you know, and then it was waiting for the box to 14 arrive and -- 15 Q. Did Raytheon ever require you to wear a 16 face mask when you worked with beryllium? 17 A. No. 18 Q. Did Raytheon ever require you to wear a 19 respirator? 20 A. No. 21 Q. Did Raytheon ever say you could wear a 22 respirator if you wanted to? 23 A. No. 24 Q. Were respirators available to the workers</p>	<p style="text-align: right;">Page 49</p> <p>1 products. I mean, even -- even after the final 2 sandblasting of an ARCO window, I didn't do any 3 packaging. 4 Q. Okay. How about during the assembly or the 5 manufacturing process when a -- when a subassembly 6 was being worked on? Did you ever see any tags on 7 the subassembly that mentioned a beryllium risk? 8 A. No, not that I know of. No. 9 Q. Did you ever see any red tags of any kind 10 on any Raytheon subassemblies? 11 A. No. 12 Q. During your years at Raytheon, did the 13 company ever give you or require you to get chest 14 x-rays? 15 A. No. 16 Q. Did the company require any kind of medical 17 tests? 18 A. No. 19 Q. Was there any requirement that you get your 20 weight taken on a periodic basis? 21 A. No. 22 Q. No? There was a physician at the plant, 23 you mentioned? 24 A. Yeah, there was.</p>

<p style="text-align: right;">Page 50</p> <p>1 Q. Was he there full-time?</p> <p>2 A. I have no idea.</p> <p>3 Q. Okay. And did you ever see him? I mean,</p> <p>4 did you ever go to talk to him?</p> <p>5 A. Yeah. Yes.</p> <p>6 Q. Okay. How many times did you see him?</p> <p>7 A. I don't recall exactly how many times, but</p> <p>8 each time that I was out of work, to be reentered</p> <p>9 into the job force, you had to go through the</p> <p>10 medical.</p> <p>11 Q. Just to be cleared to work again?</p> <p>12 A. Yeah.</p> <p>13 Q. Okay. And I take it that this -- this</p> <p>14 doctor never had any discussion with you relating</p> <p>15 to beryllium, beryllium oxide, anything like that?</p> <p>16 A. No.</p> <p>17 Q. Were you a union member when you worked at</p> <p>18 Raytheon?</p> <p>19 A. Yes.</p> <p>20 Q. Which union was that?</p> <p>21 A. I want to say 1503, but I might be wrong.</p> <p>22 Q. What's the name of the union?</p> <p>23 A. I don't know. IBW -- you know.</p> <p>24 Q. IBEW?</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. And when I say beryllium, I mean beryllium</p> <p>2 oxide, beryllium copper, all beryllium.</p> <p>3 A. No.</p> <p>4 Q. You didn't work with anything like that?</p> <p>5 A. No.</p> <p>6 Q. What did you work with over at</p> <p>7 Northborough?</p> <p>8 A. A microscope, and looked at small little</p> <p>9 contact points under a microscope all day checking</p> <p>10 people's work.</p> <p>11 Q. What were those parts made out of? Were</p> <p>12 they metal parts?</p> <p>13 A. Yeah, they were wicked small. Girls had to</p> <p>14 solder under a mic, so you're basically checking</p> <p>15 their alignments and their soldering.</p> <p>16 Q. Do you remember who your supervisor was</p> <p>17 over at Northborough?</p> <p>18 A. No, I don't.</p> <p>19 Q. Let me ask you some questions about the BWO</p> <p>20 lab. Was that -- was that a restricted access</p> <p>21 area?</p> <p>22 A. I don't really know if it was classified as</p> <p>23 anything. I mean, people wouldn't go there unless</p> <p>24 their job was in there.</p>
<p style="text-align: right;">Page 51</p> <p>1 A. I think it was 1503.</p> <p>2 Q. Did the union give -- give you any</p> <p>3 information about the health risks of your</p> <p>4 employment at Raytheon?</p> <p>5 A. No.</p> <p>6 Q. Did you always -- was all of your work for</p> <p>7 Raytheon done at the Waltham plant?</p> <p>8 A. No.</p> <p>9 Q. You also went to the Northborough plant for</p> <p>10 a while?</p> <p>11 A. Yes.</p> <p>12 Q. When was that?</p> <p>13 A. I'm really not all that sure.</p> <p>14 Q. Would that have been --</p> <p>15 A. I want to say approximately '84. Weren't</p> <p>16 there that long. We transferred back.</p> <p>17 Q. How long were you there?</p> <p>18 A. I'm not that sure if it was even a full</p> <p>19 year or if it was just over a year.</p> <p>20 Q. What kind of work did you do at</p> <p>21 Northborough?</p> <p>22 A. Quality assurance work, in process.</p> <p>23 Q. Were you working with beryllium over there?</p> <p>24 A. No.</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. Okay. But -- were they prohibited from</p> <p>2 entering unless they worked in that room?</p> <p>3 A. The only people I ever saw go in and out</p> <p>4 were mechanics who were coming in to fix something</p> <p>5 or other, or -- like I say, I never saw anyone just</p> <p>6 hanging around there.</p> <p>7 Q. Okay. Was there any kind of a sign that</p> <p>8 said no entry unless authorized or something like</p> <p>9 that?</p> <p>10 A. No.</p> <p>11 Q. And was the room locked --</p> <p>12 A. No.</p> <p>13 Q. -- so that people couldn't come in?</p> <p>14 A. No.</p> <p>15 Q. You didn't need a key to get in?</p> <p>16 A. Oh, no.</p> <p>17 Q. How big physically was this -- this</p> <p>18 laboratory, roughly? I mean, how many -- how many</p> <p>19 square feet?</p> <p>20 A. A lot bigger than this. Um, I have no</p> <p>21 idea. I may be off a bit. I may say that it was</p> <p>22 like, you know, 40 feet long by, I don't know,</p> <p>23 30 feet wide.</p> <p>24 Q. Okay.</p>

<p style="text-align: right;">Page 54</p> <p>1 A. I'm not really sure. It wasn't tiny. 2 Q. And what was in that laboratory? 3 A. A lot of tables, um, we had welders, uh, we 4 had cleaning -- like some cleaning areas where your 5 acetone, everything was kept there. Other than 6 that, you know, you had a couple of welders. There 7 was another department off of it, but I don't know 8 exactly what they did there, and you had some QA 9 people within the department. Other than that, it 10 was just everyone doing different types of 11 subassemblies. 12 Q. Just on open tables? 13 A. Yes. 14 Q. Was there any kind of a hood or ventilation 15 above the tables? 16 A. No. The only place that you had a little 17 bit of hood was probably the welder, you know, like 18 where you weld, where you're spot welding or arc 19 welding. 20 Q. All right. Let's talk a little bit about 21 that ARCO window that you worked on. Do you know 22 what the ARCO stands for, by the way? 23 A. No. 24 Q. What was the starting piece for that? In</p>	<p style="text-align: right;">Page 56</p> <p>1 probably -- there was probably a list of eight or 2 nine on the blueprint. 3 Q. Yeah. And of those eight or nine pieces, 4 how many were -- were made out of beryllium oxide 5 or beryllium copper? 6 A. The ceramic was a beryllium ceramic. 7 Q. Mm-hmm. 8 A. That one, I don't recall whether there was 9 a copper sleeve on that one or if that was a nickel 10 sleeve. 11 Q. So one of the pieces was beryllium oxide? 12 A. Right. That was my largest diameter 13 ceramic. 14 Q. What was the size and shape of that ceramic 15 piece? 16 A. Round; probably, oh, I'm going to say three 17 quarters of an inch thick. 18 Q. Okay. Was it pure ceramic, or did it have 19 metal on it as well? 20 A. We knew it to be a beryllium ceramic by the 21 print. 22 Q. Okay. But did it -- was it metalized? In 23 other words, did it have some metal on it? 24 A. Oh, yes. It had do, yeah, because it would</p>
<p style="text-align: right;">Page 55</p> <p>1 other words, if you're doing -- if you were putting 2 together one of those subassemblies, what would you 3 start with? 4 A. A bottom flange. 5 Q. What's that made out of? 6 A. I'm not really sure. It was silver. It 7 was either stainless or a nickel, um, you know, 8 overall diameter approximately like this, had 9 probably six holes drilled in it and a rectangle 10 hole on one end, inside. 11 Q. What came next? 12 A. Then you would have -- there was a sleeving 13 that came next. You're going to ask me the kind. 14 Um -- 15 Q. Do you know what that was made out of? 16 A. You know, I'm not really sure. It's been a 17 long time. 18 Q. All right. Well -- 19 A. I just know it had bosses on it and then 20 the top flange. Your ceramic was captured in 21 between. 22 Q. Okay, so -- but roughly how many pieces 23 went into one of these ARCO windows? 24 A. Including your -- your brazing compound,</p>	<p style="text-align: right;">Page 57</p> <p>1 go then to brazing. 2 Q. Before it went to brazing, did it already 3 have metal on it? 4 A. Yes, when I received it, it was already. 5 Q. Okay. What kind of metal was on it? Do 6 you know? 7 A. No idea. 8 Q. Did metal cover the whole surface of the 9 ceramic -- 10 A. No. 11 Q. -- or was some of the ceramic exposed? 12 A. The top surface and the bottom surface of 13 the diameter would be exposed. Those were the 14 surfaces that needed sandblasting. 15 Q. Okay. You said it was three quarters of an 16 inch thick, and how big around? 17 A. Approximately -- I mean, I haven't seen one 18 in a long time. It could have been three quarters; 19 could have been an inch. I just knew it was the 20 largest beryllium ceramic that I had to deal with, 21 the largest piece that I had in ceramic. 22 Q. When you say -- what was the diameter of 23 the piece? 24 A. Oh, not small. I'm going to say --</p>

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1 Q. Three inches?
 2 A. Yeah, they're the biggest one I had to deal
 3 with.
 4 Q. Okay.
 5 A. Sometimes they -- you know, if there was
 6 spatter from the outside band, you had to sandblast
 7 first before you put it down, you know, before you
 8 assemble.
 9 Q. Okay. What did you call that -- that round
 10 piece of ceramic? Did it have a name?
 11 A. A beryllium ceramic.
 12 Q. Okay. That's not the window?
 13 A. No.
 14 Q. The window was what you actually made from
 15 all the pieces, or was the window the ceramic
 16 piece?
 17 A. It -- say that one more time for me.
 18 Q. Yeah. Was the term window used to describe
 19 this round piece of ceramic, or was the window the
 20 whole thing that you put together with the eight or
 21 nine pieces?
 22 A. The entire thing is a subassembly.
 23 Q. Okay.
 24 A. The ceramic window would be, I suppose, a

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1 ceramic window. I'm not really sure.
 2 Q. So the round thing is called a window?
 3 A. It may well be. I'm not -- I'm not sure.
 4 We would just -- you would get a list. You would
 5 pick up the parts, verify them per spec, assemble
 6 it per spec, qualify it to pass.
 7 Q. Mm-hmm.
 8 A. And that's it.
 9 Q. Do you know where Raytheon purchased the --
 10 the round ceramic pieces that you were just
 11 describing?
 12 A. No idea.
 13 Q. Were there other sizes and shapes of
 14 beryllium oxide pieces that you worked with?
 15 A. Definitely.
 16 Q. Can you describe some of those for us?
 17 A. Rectangle. Okay, um, I don't know; two and
 18 a half, maybe. It was a rectangle and probably
 19 inch, inch and a quarter wide by about, you know --
 20 about that, about two -- I'm trying to think about
 21 where it fit in the center of the other pieces, but
 22 it was the only rectangle one I had to deal with.
 23 You know, it was also thick, but it was the
 24 rectangle.

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1 Q. What did you call that? That wasn't a
 2 window? That was something else?
 3 A. That was just the tall man assembly. We
 4 just -- you got the beryllium ceramic and you
 5 proceeded from there to assemble it.
 6 Q. Okay. And -- okay. So we got the window,
 7 the rectangle. What else?
 8 A. There was -- sometimes you would get a
 9 variety of little ones that would come through, but
 10 we didn't have -- I didn't actually have to do an
 11 assembly. I would just be asked to go sandblast
 12 them. You know, somebody else would have been
 13 handling the actual subassembly or whatever else
 14 had to be done to them. You know, they may have
 15 done something before, a welding job or something,
 16 and they just asked me to go clean them up.
 17 Q. Well, if the windows represented 80 percent
 18 of the --
 19 A. Right.
 20 Q. -- stuff you worked with, what -- what
 21 percentage would the rectangles represent?
 22 A. There was only a few.
 23 Q. Only a few of those?
 24 A. Yeah, because I don't know if they were

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1 like remakes -- like say that they had got
 2 something in that was out in the field or whatever
 3 and they had to have a part made for it, so you
 4 only had a few of those that you had to make and
 5 then send them on their way. I don't know if they
 6 -- it was somewhere down the line like in the
 7 factory that they were used, so we just got a small
 8 order of that, and the rest of my time was just
 9 filled by people telling me to go sandblast certain
 10 parts for them.
 11 Q. Okay. And when they asked you to sandblast
 12 these parts, would you know if the parts contained
 13 beryllium or not?
 14 A. Not always. Unless the blueprint came with
 15 it, I wouldn't know.
 16 Q. Does beryllium oxide ceramic look any
 17 different from other kinds of ceramics that
 18 Raytheon was using?
 19 A. Not to me.
 20 Q. What are some of the other kinds of
 21 ceramics that were there in the --
 22 A. They just would be little -- you'd just get
 23 a box, a clear box that would have ceramics in it,
 24 and they would ask you to sandblast them. I mean,

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1 it didn't seem -- didn't seem any different. Some
2 had silver on the edges and some had copper on the
3 edges, but I wouldn't be able to tell you the
4 difference.

5 Q. You couldn't tell by looking at a -- unless
6 you had the drawing, you couldn't tell by looking
7 at a piece of ceramic what it was made out of?

8 A. No.

9 Q. And you often got parts containing some
10 kind of ceramic; you were asked to sandblast these
11 parts, but you didn't know what the parts were made
12 out of?

13 A. Right.

14 Q. Did you ever see a -- a red tag at Raytheon
15 that said contains beryllia; do not sandblast,
16 grind, machine or abrade?

17 A. No.

18 Q. Did you ever see a red tag that said
19 contains beryllia; dust and fumes are toxic?

20 A. No.

21 Q. In fact, no one at Raytheon ever told you
22 that the dust and fumes of beryllia are toxic,
23 correct?

24 A. No.

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1 Q. Let's talk about the -- well, actually, I
2 guess I should have said at the beginning, if you
3 ever want a break, feel free to ask for one. I
4 know this is --

5 MR. HONIK: If you're going to shift
6 topics, this might be a good time to take five
7 minutes.

8 MR. UBERSAX: Yeah, why don't we do
9 that. That's fine.

10 VIDEO OPERATOR: Going off the record,
11 10:27 a.m.

12 (Off the record.)

13 VIDEO OPERATOR: On the record, 10:48
14 a.m.

15 Q. (BY MR. UBERSAX) Ms. Genereux, you talked
16 earlier about using a -- a file on some -- some of
17 the parts you worked with. Did you also use
18 sandpaper on any of these parts?

19 A. Occasionally.

20 Q. Okay. And can you tell us what you did
21 with the sandpaper?

22 A. The same thing; you --

23 Q. Same thing you did with the file?

24 A. Right.

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1 Q. Okay. Would you actually be sandpapering
2 beryllium oxide ceramic, or some metal that was
3 covering the ceramic?

4 A. I don't believe that you sandbla-- that you
5 filed or sanded the ceramic. I believe that it was
6 whatever needed to be done on the diameter to fit
7 it.

8 Q. And the diameter that you filed or
9 sandpapered was made of a -- of some kind of a
10 metal; is that right?

11 A. I believe so.

12 Q. And do you know what the metal was?

13 A. I really don't recall at which time, you
14 know, which piece I'm doing.

15 Q. Did you sometimes have to sand or file
16 beryllium copper?

17 A. Occasionally.

18 Q. But never beryllium oxide?

19 A. I wouldn't know.

20 Q. Well, as I understand it, you never
21 actually filed or sandpapered a ceramic material;
22 only metals?

23 A. Right. We sandblasted the ceramic.

24 Q. All right. Did you use something called a

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1 Drommel tool?

2 A. On occasion.

3 Q. Okay. What kind of tool is that?

4 A. It's like a little drill with a hard piece
5 on the end.

6 Q. And what did you use that for?

7 A. If -- if it called for it being used to
8 remove an excess burr or something on the material.
9 It was tools used to bring them in tolerance.

10 Q. Did you use the Drommel tool on any ceramic
11 material, or was that only on metals?

12 A. On metals.

13 Q. Did you sometimes use the Drommel tool on
14 beryllium copper?

15 A. Could have been, yes.

16 Q. Okay. When you did that, would that create
17 any -- any dust?

18 A. It always created something. Whenever
19 you're using something, it would create some kind
20 of dust.

21 Q. Did you perform any other operation on the
22 pieces that you worked with in this lab that was
23 abrasive or would cause some dust to be released?

24 A. Other than --

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1 holes into the box?

2 A. The very first machine?

3 Q. Yes.

4 A. The shield came up, so you went under like
5 a -- I don't know how you call that; just a shield
6 that came up, so your arms went underneath. It
7 wasn't actually drilled holes.

8 Q. Oh. So you lifted up the front of the
9 machine?

10 A. Mm-hmm.

11 Q. And how large was the space that was open?

12 A. Hmm. I would say maybe three feet by two
13 feet or 18 inches.

14 Q. Three feet wide?

15 A. The opening, you're saying?

16 Q. Yes.

17 A. Oh.

18 Q. The opening that you work -- that you put
19 your hands through.

20 A. Just whatever my arm -- it would come back
21 under my arm, so whatever my arm -- whatever
22 distance my arm took, so you know, that Plexiglas
23 would come back down.

24 Q. Did it come back down automatically, or did

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1 you have to lower the Plexiglas?

2 A. No, it kind -- it was loosely fitting, so
3 it would come down easy. It wasn't painful or
4 anything.

5 Q. Was there anything around your arms to make
6 the box airtight?

7 A. No, not that I can remember.

8 Q. So basically, what happened was you lift up
9 the front of the box --

10 A. Mm-hmm.

11 Q. -- and there would be an opening, say three
12 feet wide by a couple inches high, to get your arms
13 in?

14 A. Yeah.

15 Q. And that's a rectangular opening?

16 A. Yes.

17 Q. Was there some kind of exhaust ventilation
18 on the box to take the air away?

19 A. Not that I recall.

20 Q. How about --

21 VIDEO OPERATOR: One moment, please.

22 (Off the record.)

23 Q. (BY MR. UBERSAX) After the machine -- you
24 said after about a year, the machine was changed.

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1 And after the changes were made, was there exhaust
2 ventilation on the glove box?

3 A. I really don't recall seeing anything, I
4 mean, like anything particular.

5 Q. Well, when you were doing the sandblasting,
6 could -- what happened with the material, the sand
7 that was actually doing the cleaning? Where did it
8 go?

9 A. It would go through another hose to the
10 bucket where the original hose came up.

11 Q. Did anyone explain to you why the
12 sandblasting was done inside this glove box?

13 A. No. I just assumed that for the pressure
14 of the air gun.

15 Q. What do you mean by that?

16 A. Because you're sandblasting with air, and
17 whatever compound that's in there.

18 Q. Oh, so you understood that it was just to
19 keep the sand inside a -- inside the box?

20 A. Yeah.

21 Q. And you didn't have any understanding that
22 this was being used to protect you from any health
23 risk?

24 A. No.

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1 Q. And no one ever mentioned any health risk
2 in connection with this sandblasting of beryllium
3 oxide?

4 A. No.

5 Q. Okay. Did -- did any dust ever come out of
6 this glove box when you were doing the
7 sandblasting?

8 A. Yes.

9 Q. And where would it come out?

10 A. On my clothes, on my feet.

11 Q. Okay. Did it come out of the front of the
12 box?

13 A. Yes.

14 Q. And what did the dust look like?

15 A. White.

16 Q. And was it still the case after the machine
17 was changed and the gloves were attached to it that
18 dust would come out when you were sandblasting?

19 A. Yeah.

20 Q. The same amount of dust, or was it less
21 dust after the changes?

22 A. I would say somewhat less.

23 Q. Did you ever ask anyone at Raytheon about
24 what was in that dust?

<p style="text-align: right;">Page 78</p> <p>1 Q. Was -- when you were working in the BWO 2 lab, was a part of your job to clean up the lab? 3 A. Yes. 4 Q. And when would you do that? 5 A. Come in the morning and hopefully before 6 you go at night. 7 Q. How did you clean it up? 8 A. The benches would be cleaned with -- they 9 had lint-free paper, you know, and acetone. 10 Q. And when you would come in in the morning, 11 would you see any dust on the surfaces in the lab? 12 A. Yeah. 13 Q. What -- what did you see? 14 A. Just a white dust everywhere. 15 Q. And what was the thickness of the dust on 16 the surface? 17 A. I wouldn't be able to tell you. I mean, 18 just a dust, like if you looked at a table and saw 19 it was dusty and it was time to Pledge it, to wipe 20 it, same thing. 21 Q. If you ran your finger across the surface, 22 would it leave a mark? 23 A. Yeah. Yes. 24 Q. Did you ever talk to anybody about what</p>	<p style="text-align: right;">Page 80</p> <p>1 A. Right. 2 Q. Was there any other job you did? 3 A. Just the Northborough. 4 Q. Just the Northborough? Okay. Were you 5 ever doing something called production coil winder? 6 Does that ring any bells? 7 A. There was -- yeah, there was a short time. 8 There was like a temporary layoff at one end; you 9 filled in the gap by going to a different 10 department. 11 Q. So what did that involve, being a 12 production coil winder? 13 A. You -- it was such a short amount of time I 14 was there. The time I was there it's just you 15 pressed one pedal and it wound and then you pressed 16 the other pedal and it stopped. There wasn't -- 17 Q. What was the -- what were the coils made 18 out of? 19 A. I haven't got a clue. 20 Q. Was there any beryllium involved in that, 21 as far as you know? 22 A. No, not that I know of. 23 Q. So that was just a short-term thing? 24 A. Very short.</p>
<p style="text-align: right;">Page 79</p> <p>1 that dust was made out of? 2 A. I was just told that you wipe it up in the 3 morning and you build your parts and then wipe your 4 table before you go home and that's it. 5 Q. And did anyone ever say that the dust might 6 be hazardous? 7 A. No. 8 Q. Did you -- you didn't wear a mask or a 9 respirator when you were cleaning up the room in 10 the morning, did you? 11 A. No. 12 Q. Between your job in the -- in the BTO lab 13 and the quality assurance lab -- the BWO lab; 14 excuse me -- 15 A. Okay. 16 Q. -- and the quality assurance, did you have 17 any other job at Raytheon? 18 A. Say that again. Between -- 19 Q. Yeah. Well, you've told us about two jobs 20 you've had at Raytheon? 21 A. Yes. 22 Q. The first one in the BWO lab and the second 23 one is toward the end of your time there in quality 24 assurance?</p>	<p style="text-align: right;">Page 81</p> <p>1 Q. All right. Well, let's talk about the job 2 in QA. 3 A. Mm-hmm. 4 Q. What exactly were you doing in that job? 5 A. In process inspection. 6 Q. Anything else? 7 A. There were times that I would be placed on 8 incoming inspection and sometimes final inspection. 9 Q. All right. So -- well, let's take them in 10 order. What is incoming inspection? 11 A. There you would sit at a bench with a 12 blueprint and verify the item had the same part 13 number as the print. 14 Q. Were you -- as an incoming inspector, were 15 you receiving parts as they came to Raytheon from 16 the outside vendors? 17 A. They were coming in, but I mean, you got a 18 certain amount of pieces. 19 Q. Right. Were they in the packaging that the 20 outside vendor sent them in? 21 A. Not always. 22 Q. Sometimes they were? 23 A. Sometimes you went out there. 24 Q. You went out where?</p>

<p style="text-align: right;">Page 102</p> <p>1 ever see that or anything like it?</p> <p>2 MR. HONIK: Object to the form of the</p> <p>3 question.</p> <p>4 A. No.</p> <p>5 MR. UBERSAX: Well, what's the</p> <p>6 objection?</p> <p>7 MR. HONIK: Well, you're characterizing</p> <p>8 it, you know, and it may be a label, and I</p> <p>9 recognize that it says R-A-Y at the bottom, and I</p> <p>10 don't mean to be hypertechnical about it, but</p> <p>11 they're reproductions of something. We don't know</p> <p>12 their date. We don't know their origin. So to the</p> <p>13 extent that you characterize it in any way beyond</p> <p>14 I'm handing you such and such an exhibit, that's my</p> <p>15 objection.</p> <p>16 MR. UBERSAX: Fine. I'll rephrase it,</p> <p>17 then.</p> <p>18 Q. (BY MR. UBERSAX) Have you ever seen a copy</p> <p>19 of Exhibit 4 before?</p> <p>20 A. No.</p> <p>21 Q. Have you ever seen any document -- anything</p> <p>22 like that in your years at Raytheon?</p> <p>23 A. No.</p> <p>24 Q. Did you ever see any -- any document that</p>	<p style="text-align: right;">Page 104</p> <p>1 this look to you like the window that you spent so</p> <p>2 much of your time working with?</p> <p>3 A. No. It has a through-hole in it, and we</p> <p>4 didn't have -- the ones I did did not have</p> <p>5 through-holes through them.</p> <p>6 Q. Okay. At the bottom of the page, do you</p> <p>7 see the little box where it says assembly contains</p> <p>8 beryllia; control per provisions of Standard Number</p> <p>9 37 dash 3066 dash 130?</p> <p>10 A. Mm-hmm.</p> <p>11 Q. Do see that? Was that little box with that</p> <p>12 language on the drawings that you worked with?</p> <p>13 A. I don't recall that.</p> <p>14 Q. You've never seen that before?</p> <p>15 A. No.</p> <p>16 (Exhibits 6 and 7 marked for</p> <p>17 identification.)</p> <p>18 Q. Exhibit 6 is Bates stamped GEN 395 to 96.</p> <p>19 Have you seen that before?</p> <p>20 A. No, not like that.</p> <p>21 Q. No? Do you see the -- the notes in note</p> <p>22 three in particular where it says that exterior of</p> <p>23 package shall contain a precautionary label</p> <p>24 including instructions; do not open at receiving?</p>
<p style="text-align: right;">Page 103</p> <p>1 warned about any danger from any form of beryllium?</p> <p>2 A. No.</p> <p>3 Q. Did the blueprints that you worked with say</p> <p>4 anything on them about beryllium?</p> <p>5 A. Just when it called for a beryllium</p> <p>6 ceramic, it would say either spelled out beryllium</p> <p>7 or BE. That's the only reason that I even know</p> <p>8 what it is.</p> <p>9 (Exhibit 5 marked for identification.)</p> <p>10 Q. All right. Exhibit 5 is Bates stamped GEN</p> <p>11 372. Do you recognize that?</p> <p>12 A. I don't recall it, no.</p> <p>13 Q. You don't?</p> <p>14 A. It's not a blueprint that I was privy to.</p> <p>15 Q. It's not?</p> <p>16 A. No.</p> <p>17 Q. Okay. How do you know that?</p> <p>18 A. Because I only had a couple of them that I</p> <p>19 actually worked with.</p> <p>20 Q. Okay. And that -- you see it says -- at</p> <p>21 the top, it says title, insulator window?</p> <p>22 A. There could have been -- some things were</p> <p>23 called insulators, you know?</p> <p>24 Q. And some things were called windows? Does</p>	<p style="text-align: right;">Page 105</p> <p>1 A. I see it on here.</p> <p>2 Q. Did you ever see that language on any of</p> <p>3 the blueprints or drawings that you worked with?</p> <p>4 A. Nothing that I worked with, no.</p> <p>5 Q. Okay. All right. Now let's turn to</p> <p>6 Exhibit 7, Bates stamped GEN 423. Is that a</p> <p>7 drawing you've seen before?</p> <p>8 A. I don't know for sure. This -- this isn't</p> <p>9 the one I worked with. I don't know.</p> <p>10 Q. Okay.</p> <p>11 A. I have never seen this particular drawing</p> <p>12 before.</p> <p>13 Q. All right. Do you see there's a little box</p> <p>14 in the middle of the page: Warning, this part is</p> <p>15 beryllium oxide; hazardous; control per provisions</p> <p>16 of Standard 37-3066-130?</p> <p>17 A. I see it on here.</p> <p>18 Q. Do you ever see that when you were at</p> <p>19 Raytheon?</p> <p>20 A. I don't recall seeing that.</p> <p>21 Q. Well, when you worked at Raytheon, you had</p> <p>22 no idea that beryllium oxide could be hazardous,</p> <p>23 did you?</p> <p>24 A. No.</p>

<p style="text-align: right;">Page 106</p> <p>1 Q. When you were at Raytheon, did you ever 2 learn that any other employee had had some kind of 3 test, medical test relating to beryllium? 4 A. No. 5 Q. And I take it you never heard that a 6 Raytheon employee had gotten a disease from 7 beryllium? 8 A. No. 9 Q. Since you left in 1990, have you heard of 10 any other Raytheon employee coming down with 11 chronic beryllium disease? 12 A. No. 13 Q. Have you heard of any other Raytheon 14 employee testing positive for sensitization to 15 beryllium? 16 A. I had only heard that there were people who 17 were going to go for tests. I haven't heard 18 anything from anybody. 19 Q. Okay. Where did you hear that people are 20 going for tests? 21 MR. HONIK: What's the source of your 22 knowledge? 23 A. Well, when we got together -- 24 MR. HONIK: If it's from your counsel</p>	<p style="text-align: right;">Page 108</p> <p>1 you were working for Raytheon? 2 A. No. 3 Q. So who was the first doctor that you talked 4 to about working with beryllium at Raytheon? 5 A. Dr. Newman. 6 Q. Dr. Newman? 7 A. Well, excuse me. Let me rephrase that. 8 Dr. Ashley, when he had the test done, when 9 National Jewish sent him the test kit, he said it 10 was a VELPT test, and he had said did you ever work 11 with it? And I said well, I knew some parts I had 12 had beryllium in them because it said so on the 13 print. 14 Q. Okay. So this conversation happened after 15 the test results were already back? 16 A. Well, they have to take the blood first. 17 Q. Okay. When they took the blood, did you 18 talk to Dr. Ashley? 19 A. He called me to tell me it was positive. 20 Q. Well, did you talk to Dr. Ashley about 21 beryllium before the test results came back? 22 A. Just when I had told him that I had worked 23 with it, before they took the blood. 24 Q. Before they took the blood? And was that</p>
<p style="text-align: right;">Page 107</p> <p>1 -- 2 A. Right. 3 MR. HONIK: All right. Well, that you 4 can't share. 5 Q. (BY MR. UBERSAX) Okay. When you were 6 working at Raytheon, did you ever develop any kind 7 of a skin rash? 8 A. I had some like things like that on the 9 nose, you know, like those bumps and stuff, but I 10 didn't consider it to be anything -- like on my 11 hands or anything, it was short-term, like they 12 would get itchy, or -- but I don't -- I didn't -- 13 Q. This was on your nose? 14 A. No. Well, like I always had some stuff on 15 here, like these bumps, and I had things on my 16 hands, but it was just like itchy, and these 17 things, the only things that are left, that every 18 so often they just bleed. 19 Q. You still get them long after leaving 20 Raytheon? 21 A. No, just these here now, but the ones on my 22 hands have pretty much gone away; just that they 23 got itchy. 24 Q. Did you ever see a doctor about that when</p>	<p style="text-align: right;">Page 109</p> <p>1 in his office where you had this conversation? 2 A. Yes. 3 Q. Did he ask you questions about your work 4 with beryllium? 5 A. No. 6 Q. What did you tell him about your work with 7 beryllium? 8 A. Just that I knew that I sandblasted with 9 beryllium. 10 Q. And was it -- was this conversation with 11 Dr. Ashley on the same day that they drew the blood 12 to send it off to be tested? 13 A. I don't recall if it was the same day. It 14 may have been the week before they ordered the kit. 15 Q. Okay. So it was either -- it was either 16 before they drew the blood or the same day that 17 they drew the blood, right? 18 A. It could well have been somewhere in that 19 time frame. 20 Q. Well, to the best of your recollection, was 21 this conversation with Dr. Ashley either before or 22 on the same day as they drew the blood to send it 23 off to National Jewish? 24 A. To the best of my recollection, I talked to</p>

<p style="text-align: right;">Page 210</p> <p>1 test report which is --</p> <p>2 MR. HONIK: You want to look at the</p> <p>3 June 23rd, '01 LPT?</p> <p>4 MR. WYMAN: Yes. A copy of it was</p> <p>5 produced at RAY 000307, and you have a copy of it</p> <p>6 over there that you put in front of the witness?</p> <p>7 MR. HONIK: Yes.</p> <p>8 MR. WYMAN: Okay. I have another copy</p> <p>9 here, if you want to keep yours.</p> <p>10 MR. HONIK: It doesn't matter. She's</p> <p>11 got it.</p> <p>12 Q. (BY MR. WYMAN) Do you recognize that</p> <p>13 document, Mrs. Genereux?</p> <p>14 A. Yeah.</p> <p>15 Q. What do you recognize it to be?</p> <p>16 A. It's the first result of the beryllium test</p> <p>17 that came back.</p> <p>18 Q. Okay. And do you have a recollection that</p> <p>19 that test was performed in June of 2001?</p> <p>20 A. I see the date on here, and it was more</p> <p>21 than likely the first one.</p> <p>22 Q. Okay. Do you have a recollection of any of</p> <p>23 the conversations that you had with Dr. Newman's</p> <p>24 office prior to that time, if any?</p>	<p style="text-align: right;">Page 212</p> <p>1 one time before they sent out the test kit?</p> <p>2 A. No, I don't believe so.</p> <p>3 Q. Okay. Do you have any way of pinpointing</p> <p>4 the date of that conversation?</p> <p>5 A. No.</p> <p>6 Q. Now, is there anything that occurred</p> <p>7 between your communications with the Department of</p> <p>8 Labor when you had that request for benefits which</p> <p>9 was denied and the communication with Dr. Newman?</p> <p>10 Were there any other communications that you had</p> <p>11 with anybody else in between --</p> <p>12 MR. HONIK: Object to the form of the</p> <p>13 question.</p> <p>14 Q. (BY MR. WYMAN) -- with respect to your</p> <p>15 breathing problems or beryllium?</p> <p>16 MR. HONIK: Excuse me. Object to the</p> <p>17 form of the question.</p> <p>18 A. Can you --</p> <p>19 Q. (BY MR. WYMAN) Too much?</p> <p>20 A. Yeah.</p> <p>21 Q. Okay. Let me try to break it down into</p> <p>22 pieces.</p> <p>23 A. Okay.</p> <p>24 Q. You had communications with the Department</p>
<p style="text-align: right;">Page 211</p> <p>1 A. Just the fact that they were sending a kit</p> <p>2 down.</p> <p>3 Q. Mm-hmm. And do you recall how long in</p> <p>4 advance of having that first test done that they</p> <p>5 sent that kit down?</p> <p>6 A. Not very long in advance. Not long after</p> <p>7 she got it, they called me at the lab.</p> <p>8 Q. Okay. And that was at Dr. Ashley's office?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. So the sequence was you communicated</p> <p>11 with them in 2001. Did you call them, or did they</p> <p>12 call you, or --</p> <p>13 MR. HONIK: I'm sorry. Who's them?</p> <p>14 MR. WYMAN: The National Jewish</p> <p>15 Hospital, Dr. Newman's facility.</p> <p>16 MR. HONIK: Okay.</p> <p>17 Q. (BY MR. WYMAN) Do you recall how you first</p> <p>18 made contact with them? Was it a telephone call,</p> <p>19 was it a letter, or --</p> <p>20 A. No, I -- I called them.</p> <p>21 Q. Okay. And do you have any recollection of</p> <p>22 who you talked to?</p> <p>23 A. Heather Davis.</p> <p>24 Q. Okay. And did you talk to her more than</p>	<p style="text-align: right;">Page 213</p> <p>1 of Labor and they turned down your application for</p> <p>2 benefits, correct?</p> <p>3 A. Not at this time.</p> <p>4 Q. That was before, wasn't it?</p> <p>5 A. No.</p> <p>6 MR. HONIK: Object to the form of the</p> <p>7 question.</p> <p>8 Q. (BY MR. WYMAN) Okay. Which -- let's go</p> <p>9 back to the Department of Labor for just a second.</p> <p>10 Let me try to get the time down, okay?</p> <p>11 A. Yes.</p> <p>12 Q. That happened before you had your first</p> <p>13 test at the National -- from the National Jewish</p> <p>14 Hospital?</p> <p>15 MR. HONIK: Object to the form of the</p> <p>16 question.</p> <p>17 Q. (BY MR. WYMAN) Am I right?</p> <p>18 A. My conversation with Department of Labor</p> <p>19 happened before this.</p> <p>20 Q. Yes.</p> <p>21 A. But not the -- not the DOE thing.</p> <p>22 Q. Oh, okay. Okay.</p> <p>23 A. There's -- sorry. It's Department of Labor</p> <p>24 who told me National Jewish.</p>

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1 Q. Okay. They're the ones who told you to
2 call out there?
3 A. Right.
4 Q. That's what I was trying to get. Did they
5 specific -- did you discuss specifically beryllium
6 or beryllium disease as a possibility with anybody
7 at the Department of Labor?
8 A. I really don't understand what you're
9 asking me.
10 Q. Do you -- when you spoke with the
11 Department of Labor and they recommended that you
12 call the National Jewish Hospital --
13 A. Right.
14 Q. -- did they tell you why they wanted you
15 to call the National Jewish Hospital?
16 A. They asked me if I had worked with anything
17 with beryllium.
18 Q. Mm-hmm. Okay. And did you respond?
19 A. Yes.
20 Q. You said yes?
21 A. Yes.
22 Q. And that's what caused you to place a
23 telephone call to the National Jewish Hospital; is
24 that correct?

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1 A. Correct.
2 Q. And sometime shortly after that call, they
3 sent you the test kit --
4 A. Correct.
5 Q. -- that -- the results of which are
6 reflected on the document that's in front of you
7 right now; is that correct?
8 A. Yes.
9 MR. WYMAN: I would like to mark a copy
10 of that document and we can either have it be my
11 copy or your copy, Mr. --
12 MR. HONIK: Your copy, please.
13 MR. WYMAN: -- as the next exhibit,
14 which is number 9, I believe.
15 (Exhibit 9 marked for identification.)
16 Q. (BY MR. WYMAN) So that communication that
17 you had with the Department of Labor where they
18 asked you about whether you were exposed to
19 beryllium anywhere and you said yes --
20 A. Mm-hmm.
21 Q. -- and they suggested you call the
22 National Jewish Hospital happened sometime weeks
23 before this particular test kit arrived and then
24 was sent back to generate the results on Exhibit 9;

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1 is that correct?
2 MR. HONIK: Object to the form of the
3 question.
4 A. To the best of my knowledge.
5 Q. (BY MR. WYMAN) Okay. And that's all you
6 can give me, and thank you for that.
7 If you were to try to get a copy of the
8 assembly drawings that you were using while you
9 were at Raytheon for the parts that were involved
10 in the sandblasting operation you were working on,
11 how -- how would you describe those drawings to
12 help somebody try to locate the right drawings for
13 you?
14 (Witness gesturing.)
15 Q. What's your best -- do you have any
16 recollection of the numbers that might have been on
17 them?
18 A. No, I have no idea.
19 Q. The names?
20 A. The only one I knew of was ARCO, because it
21 was on the print.
22 Q. And it said ARCO on the print?
23 A. A-R-C-O.
24 Q. A-R-C-O? Anything else that you can

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1 remember about it at all that might be on the print
2 to help us to identify it?
3 A. Just the bottom flange, top flange,
4 beryllium ceramic, end bosses.
5 Q. Those are the things that you would
6 associate with the drawing that would help to
7 identify it, if we could find it?
8 (Witness gesturing.)
9 A. There was a sleeve, too. I'm sorry.
10 Q. And a sleeve?
11 A. That the bosses go into.
12 Q. Okay. Were there a lot of revisions on
13 this drawing, on these drawings, or you don't
14 remember that?
15 A. I have no idea.
16 Q. Okay. And you didn't know any of the
17 people who were involved in the preparation of the
18 drawing either?
19 A. No.
20 Q. Okay. Do you have any symptoms or things
21 that have happened to you that you associate with
22 the beryllium disease that you believe you have?
23 A. Yes.
24 Q. Could you tell me what they are?

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1 a civil lawsuit in Rhode Island?
 2 A. No, I don't.
 3 Q. Do you know what court had jurisdiction
 4 over that part of Rhode Island?
 5 A. No, I don't.
 6 Q. Okay. Any other claims or lawsuits other
 7 than what we've mentioned so far?
 8 A. Not to my knowledge.
 9 Q. Was the Workers Compensation claim that you
 10 recently resolved the only Workers Compensation
 11 claim you've ever filed?
 12 A. Yes.
 13 Q. And the disability claim for long term
 14 disability, is that the only long term disability
 15 claim you ever filed?
 16 A. I believe so, yes.
 17 Q. And in terms of SSDI benefits, you've only
 18 applied for those one time; is that right?
 19 A. Yes.
 20 Q. Do you remember who recommended that you
 21 treat with Dr. Walters?
 22 A. I believe it -- to the best of my
 23 knowledge, it was Dr. Yearwood.
 24 MR. AHERN: That's all I have. Thanks.

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1 MR. HONIK: Any more from anyone else?
 2 MS. LINDEMANN: Yeah, I'm going to ask
 3 some questions. Do you want me to wait?
 4 MR. HONIK: Go right ahead.
 5 CROSS-EXAMINATION
 6 Q. (BY MS. LINDEMANN) Hi, Mrs. Genereux. I'm
 7 Frances Lindemann, and I'm the lawyer for Hardric
 8 Industries. And I'm sorry to be last and having to
 9 ask you questions, but I'm really interested in the
 10 period of time from 1982 to 1990 and your work at
 11 Raytheon.
 12 A. Mm-hmm.
 13 Q. So if we can go back there a little bit. I
 14 understood you saying that you only worked with
 15 basically two assembly drawings, the ARCO and the
 16 tall man?
 17 A. Right.
 18 Q. Does that mean that you were on two
 19 projects during that eight years?
 20 A. Those were the two main things that I had
 21 to do.
 22 Q. And so basically, it was sort of an
 23 assembly line process where you had a particular
 24 part or component that you would put together, and

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1 then you'd hand it on to someone else?
 2 A. Right. Then it would go off somewhere
 3 else.
 4 Q. Okay. And I've read a description in -- I
 5 think it was probably in Colorado -- of you working
 6 with windows?
 7 A. That's what they called beryllium. The
 8 ceramic was called the window, you know.
 9 Q. Okay. And was that ARCO or tall man?
 10 A. They were both called windows.
 11 Q. Okay. So they were both windows?
 12 A. Yeah, that's just the name that they used
 13 to call them.
 14 Q. Okay. Were there different windows in the
 15 ARCO and in the tall man? I mean, the windows was
 16 the piece, the beryllium oxide piece?
 17 A. Right.
 18 Q. Okay. And what size were they, roughly,
 19 the ones that you worked with?
 20 A. ARCO was a diameter rather large and thick,
 21 where the tall man was a rectangle, and it was
 22 thick, but it was rectangle and -- you know, off
 23 the top of my head, to remember exactly how big, I
 24 would say like this and probably this wide.

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1 Q. Okay. And when you say thick, can you show
 2 me with your fingers?
 3 A. Well, ARCO was your thicker, so I'm going
 4 to estimate it to be approximately like this.
 5 Q. Okay.
 6 A. And the other one was a little thicker,
 7 because you know, it -- you had like different
 8 steps, you know?
 9 Q. Now, the only time that you actually
 10 created dust with those beryllium oxide pieces, was
 11 that when you were sandblasting?
 12 A. Right.
 13 Q. And the description that you made of
 14 working on a window and putting it in copper or
 15 some other metal and brazing it --
 16 A. Right.
 17 Q. -- was that both tall man and ARCO?
 18 A. Right.
 19 Q. Do you know what they were used for
 20 ultimately?
 21 A. No.
 22 Q. You said that those two projects were what
 23 you worked on primarily?
 24 A. Right.

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1 Q. Can you recall any other projects?
 2 A. I'd be given small pieces and asked to
 3 weld, take this little piece and weld it on to that
 4 one, just spot weld it, you know. So you would go
 5 and you might weld 25 of them, and you didn't have
 6 anything to work with; you just welded them. It
 7 could have been used for somebody else to continue
 8 it on.
 9 Q. Was that beryllium?
 10 A. I don't know. I didn't get anything except
 11 told exactly -- one person would show you how to do
 12 it, and then you would repeat the process for as
 13 many as there were.
 14 Q. With the tall man and with the ARCO, was
 15 your process the same of putting it together where
 16 you would put -- do the brazing, put them in the
 17 metal, and all the -- and put in the flanges? Were
 18 they the same design except for different shapes?
 19 A. I'm going --
 20 Q. If you can describe?
 21 A. If I can correct you on it --
 22 Q. Yeah.
 23 A. I believe it to be similar. You had
 24 various materials being put together. You aligned

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1 them. Some pieces -- like the bosses had to be
 2 welded on first. You know, you would clean that
 3 and then you would put the Eutectic or whatever
 4 brazing compound they needed. You would load it
 5 into a stainless steel grained fixture. This
 6 fixture would go on to brazing. A day or two
 7 later, you would get the fixture back. And another
 8 person would check for leaks or holes in the
 9 soldering or the brazing. And when it passed that
 10 person, you would get it back and it would need to
 11 be cleaned up, brushed, looked for defects on it
 12 and then it went on.
 13 Q. And that was true with regard to both ARCO
 14 and tall man?
 15 A. Right, just different fixtures, different
 16 sizes.
 17 Q. In a week, what would be the average number
 18 of units you would make? Or work on; excuse me.
 19 A. Every week was so different. It really
 20 varied depending on how difficult it was. If you
 21 had pieces that you really had to work and file to
 22 fit to get them in that specification, you would
 23 spend more time with it.
 24 Q. But would it be, say, one one week and ten

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1 another week --
 2 A. Oh, no.
 3 Q. -- sometimes or would it be --
 4 A. You would -- I'm going to say you could
 5 easily probably average ten ARCO's to completion
 6 every week, and by the end of the week, you would
 7 do a massive final sandblasting for shipping.
 8 Q. Okay. How many years of that time period
 9 did you work on the ARCO project, do you think?
 10 A. From beginning until I left to QC.
 11 Q. Okay. And how many years did you work on
 12 the tall man?
 13 A. Oh, that didn't come into play until maybe
 14 after a year or so after I was in the lab, when
 15 they were sure I wasn't going to screw up on it.
 16 Q. So was tall man more complex?
 17 A. Yes.
 18 Q. And how many, an average, would you guess
 19 that you made of those a week when you worked on
 20 them?
 21 A. My best, probably four or five.
 22 Q. What would you say your average was?
 23 A. Three.
 24 Q. Did either of these projects incorporate

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1 tubing -- you know, circular tubes -- in any way?
 2 A. No.
 3 Q. Only one more.
 4 A. Mm-hmm.
 5 Q. As you sit here and you think about all the
 6 dust, the dust I've heard in the -- in the bench
 7 area and sandblasting and at home, was it similar
 8 dust? Would you recall it as being the same kind
 9 of dust?
 10 A. Somewhat similar. I mean, what I had at
 11 home would be in my smock pockets. Back then, we
 12 wore pants with cuffs; in your cuffs of your pants,
 13 you know, and it definitely was the stuff that I
 14 was sandblasting with or sandblasting.
 15 Q. So it was the same color in all three
 16 places?
 17 A. Oh, yeah.
 18 Q. And it was white?
 19 A. Right. White.
 20 Q. Okay. No more questions. Thank you.
 21 REDIRECT EXAMINATION
 22 Q. (BY MR. UBERSAX) I just have a couple,
 23 then we'll get out of here. Did either the tall
 24 man or the ARCO include helical rods?

<p style="text-align: right;">Page 262</p> <p>1 A. No.</p> <p>2 Q. No? And did you ever hear the expression</p> <p>3 matchsticks when you were working at Raytheon?</p> <p>4 A. No.</p> <p>5 Q. Do you recognize the name Steven Donaghey,</p> <p>6 D-O-N-A-G-H-E-Y?</p> <p>7 A. If it's the one I'm thinking of, tall,</p> <p>8 white-haired guy, that's as far as I could tell</p> <p>9 you.</p> <p>10 Q. Was he your department manager?</p> <p>11 A. No, not that I -- I mean, not that I know.</p> <p>12 He may well have been, but not that I'm aware of,</p> <p>13 you know.</p> <p>14 Q. You have no recollection of Mr. Steven</p> <p>15 Donaghey approving a request by Al Broadbent that</p> <p>16 you receive a security clearance for access to</p> <p>17 Department of Defense information?</p> <p>18 A. No.</p> <p>19 Q. No? Let me show you this document --</p> <p>20 A. Yeah.</p> <p>21 Q. -- which is RAY 2564. Why don't we mark</p> <p>22 that. We'll make it an exhibit, too.</p> <p>23 (Exhibit 11 marked for identification.)</p> <p>24 Q. That doesn't refresh your recollection?</p>	<p style="text-align: right;">Page 264</p> <p>1 Q. Okay. Did you receive some training from</p> <p>2 Raytheon in hazard communications?</p> <p>3 A. Not that I was aware of.</p> <p>4 Q. Do you recall any kind of a meeting where a</p> <p>5 Raytheon employee made a presentation to the</p> <p>6 assembled group about health and safety risks?</p> <p>7 A. No.</p> <p>8 Q. And it's -- it's clear to you that you</p> <p>9 didn't receive any training from Raytheon that</p> <p>10 related in any way to beryllium, correct?</p> <p>11 A. Not to beryllium, no. If anything, the</p> <p>12 only thing -- unless it had to do with the welders,</p> <p>13 like the argon welding is the only thing I can -- I</p> <p>14 don't -- I mean, I did some welding for a little</p> <p>15 while. They had like a closet they had transferred</p> <p>16 into a welding station, and I got to wear one of</p> <p>17 them shields and learn how to weld without burning</p> <p>18 my finger.</p> <p>19 Q. Have you lived in the same house since</p> <p>20 1997?</p> <p>21 A. Yes.</p> <p>22 Q. Why did you move into the house that you're</p> <p>23 now in?</p> <p>24 A. Because it was -- because it was easier for</p>
<p style="text-align: right;">Page 263</p> <p>1 A. No. I had a plain blue badge like</p> <p>2 everybody else.</p> <p>3 Q. Okay. Were there some people who had</p> <p>4 badges that indicated --</p> <p>5 A. Some had red backgrounds. My husband had a</p> <p>6 red background.</p> <p>7 Q. Did that mean that he had a security</p> <p>8 clearance?</p> <p>9 A. Yes.</p> <p>10 Q. And were there other colors besides red?</p> <p>11 A. Some people had a bar on top, but we didn't</p> <p>12 question. I mean, some of them just had a little</p> <p>13 bar thing on top.</p> <p>14 Q. Okay.</p> <p>15 A. I mean, mine just had a typical blue</p> <p>16 background.</p> <p>17 (Exhibit 12 marked for identification.)</p> <p>18 Q. Exhibit 12 is RAY 2588, record of employee</p> <p>19 training. I have been trained as required by the</p> <p>20 hazardous communications standard, name, signature.</p> <p>21 Have you seen that before?</p> <p>22 A. I don't recall it, but --</p> <p>23 Q. Is that your signature on the page?</p> <p>24 A. Looks like it.</p>	<p style="text-align: right;">Page 265</p> <p>1 me to get around. I had a tri-level. This is a</p> <p>2 one-level.</p> <p>3 Q. And was it the side effects of the stroke</p> <p>4 or the after-effects of the stroke that caused you</p> <p>5 to move into this new house?</p> <p>6 A. At the time, it was one year from my stroke</p> <p>7 and I had two young children.</p> <p>8 Q. What's different about the new house, the</p> <p>9 1997 house?</p> <p>10 A. What's different?</p> <p>11 Q. Yeah, what's different about the new house</p> <p>12 from the old house that makes it easier for you?</p> <p>13 A. I get to do laundry.</p> <p>14 Q. Oh. How is that?</p> <p>15 A. Because the other one, the washer was in</p> <p>16 the basement.</p> <p>17 Q. Oh, okay.</p> <p>18 A. But other than that, it's home. It's one</p> <p>19 floor.</p> <p>20 Q. Do you -- okay. Is laundry one of the</p> <p>21 chores that you now do around the house?</p> <p>22 A. Oh, yeah.</p> <p>23 Q. All right. Thanks. Those are all the</p> <p>24 questions I have.</p>

